

CONSENT DECREE VIOLATION AND FOLLOW-UP FORM

PART A: REPORT OF VIOLATION

Company Name and Location: U.S. STEEL, CLAIRTON WORKS, PA 15025

Program/Statute: AIR EPA Docket No. _____ AFS No.: 42-003-00032

Requirement(s) in violation: SIP, ARTICLE XX ACHD, SECOND CONSENT DECREE AND COKE OVEN NESHAP PROHIBIT THE EMISSION OF THE UNBURNED COKE OVEN GAS INTO THE OPEN AIR. FLARE OF COG WITH H₂S HIGHER THAN 50 GR/100 SCF IS ALSO NOT ALLOWED.

Requirement(s) due date(s): _____

Requirement(s) completed late: _____ [date(s)] Requirement(s) not completed: _____ (check)

COMMENTS: ON SEPTEMBER 4, 1994 UNBURNED COG WAS EMITTED INTO THE OPEN AIR FOR 120 MIN. THRU THE FLARE THAT FAILED TO IGNITE. ALSO, ON THE SAME DAY RAW COG WAS FLARED FOR ABOUT 16 HRS IN DIRECT VIOLATION OF THE 2ND C.D.

Violation documented by: Signature/date: Michael Ioff 10-17-94

Print/type name: MICHAEL IOFF

Title/Mail Code: IRON AND STEEL EXPERT (3AT23)

PART B: DECISION ON RESPONSE TO VIOLATION

Type of enforcement action planned: _____

Enforcement action determined not to be appropriate for the following reason(s): _____

Concurrences by: Program Office Office of Regional Counsel

NAME/SIGNATURE _____

TITLE/ORGANIZATION _____

DATE _____

517-42003 00031

Enforcement Case Screening Worksheet

Name of Violator: USX Clairton,
Address: PA

Type of Violation: NOX

Statute(s) and/or regulation(s) violated: CEM, SIP

Type of business/manufacturing process: Steel

Date(s) and duration of known violations:

Previous enforcement history: yes

Violations under other statutes or programs, known or suspected.
(if suspected, state basis)

In violation at present time? yes

Has there been state or local enforcement? (if so, describe,
including present status) NO

Is the facility operating under a state or local compliance
agreement or order? (if so, describe key provisions, including
relief specified, and compliance demonstration requirements)

NO

Has the facility paid any penalties for the present violation(s)?
If so, state amount.

NO

Civil Judicial Enforcement Potential

- a) legal or program precedent
- b) potential for environmental harm
- c) repeat violator
- d) need for injunctive relief
- e) anticipated penalty
- f) other issues?

Pollution Prevention issues

- a) Toxic Release Inventory? - If so, attach list.
- b) any known PP strategies or guidance

Contractor listing, suspension, debarment

- a) Potential?

Multi Media Potential

- a) any identified multi media issues?
- b) is further investigation warranted?

Innovative Settlement Approaches

- a) ADR
- b) Field citation potential?

OtherCriminal Enforcement Potential Discussed

- ~~a) any known or suspected criminal act(s)?~~

